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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 15-00051 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	CONTINUING HEARING DATE AND
v.)	EXCLUDING TIME FROM JANUARY 22, 2016
)	TO FEBRUARY 26, 2016
THANH P. TRUONG, and)	
JEFFREY MENIES,)	
)	
Defendants.)	

The defendants, Thanh P. Truong, represented by Angela Hansen, and Jeffrey Mennies, represented by Garrick Lew, and the government, represented by Scott D. Joiner, Assistant United States Attorney, hereby stipulate and agree as follows:

1. The matter is currently set for change of plea/motions setting on January 22, 2016 at 9:30 AM in Oakland.
2. Counsel for the government has a scheduling conflict because he is scheduled to appear in a separate matter for a motions hearing in an eleven-defendant RICO case that was specially set for the same time before the Hon. William H. Orrick in San Francisco (CR 13-00764 WHO).

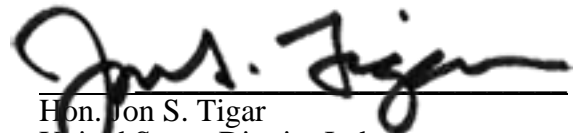
~~[PROPOSED]~~ ORDER

Pursuant to stipulation, IT IS HEREBY ORDERED that the court proceeding currently scheduled on January 22, 2016, be continued to February 26, 2016, at 9:30 AM.

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between January 22, 2016, and February 26, 2016, would unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between January 22, 2016, and February 26, 2016, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time between January 22, 2016 through and including February 26, 2016, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: January 20, 2016 _____


Hon. Jon S. Tigar
United States District Judge